

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EDUCATIONAL CREDIT
MANAGEMENT CORP.,

Plaintiff,

-against-

NU-VALET CLEANERS, INC.,

Defendant.

CIVIL ACTION NO. 07-9531 (LTS)

Civil Action

**NOTICE OF MOTION TO ADMIT
CHRISTOPHER P. MASSARO, ESQ.
PRO HAC VICE AS COUNSEL FOR
PLAINTIFF**

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District

Court for the Southern District of New York, I, Kenneth L. Baum, Esq., a member in
good standing of the bar of this Court, hereby move for an Order allowing the admission
pro hac vice of:

Applicants Name: Christopher P. Massaro, Esq.

Firm Name: Cole, Schotz, Meisel, Forman & Leonard P.A.

Address 900 Third Avenue – 16th Floor

New York, New York 10022

and

25 Main Street, Hackensack, New Jersey 07602

Phone Number (212) 758-8000 and (201) 525-6234

Fax Number (201) 678-6234

Christopher P. Massaro, Esq. is a member in good standing of the Bar of the State
of New Jersey. There are no pending disciplinary proceedings against Christopher P.
Massaro in any State or Federal Court;

FILED
U.S. DISTRICT COURT
S.D. OF N.Y.
CONFED-7 PM 9:56

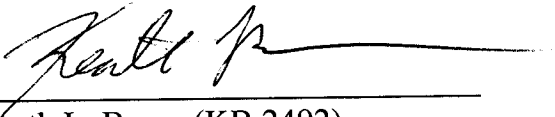
640628 #25 2-7-08 M2

Dated: February 5, 2007
New York, New York

Respectfully submitted,

COLE, SCHOTZ, MEISEL, FORMAN &
LEONARD, P.A.
A Professional Corporation

By: _____


Kenneth L. Baum (KB 2492)
Attorneys for Plaintiff Educational Credit
Management Corporation
900 Third Avenue – 16th Floor
New York, New York 10022
(212) 752-8000

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EDUCATIONAL CREDIT
MANAGEMENT CORPORATION,

Plaintiff,

-against-

NU-VALET CLEANERS, INC.,
Defendant.

CIVIL ACTION NO. 07-9531 (LTS)

Civil Action

**AFFIDAVIT OF KENNETH L. BAUM,
ESQ. IN SUPPORT OF MOTION TO
ADMIT CHRISTOPHER P. MASSARO,
ESQ. *PRO HAC VICE* AS COUNSEL FOR
PLAINTIFF**

STATE OF NEW JERSEY)

) ss.:

COUNTY OF BERGEN)

KENNETH J. BAUM,, being duly sworn, deposes and says:

1. I am an attorney-at-law in good standing of the States of New York and New Jersey, and a member of the firm of Cole, Schotz, Meisel, Forman & Leonard, P.A., counsel for Plaintiff, Educational Credit Management Corporation, in the above matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Christopher P. Massaro, Esq. as counsel pro hac vice in this matter.

2. I am a member in good standing of the bar of the State of New York, and have been admitted to practice law since 1993. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Christopher P. Massaro, Esq. since 2004.

4. Mr. Massaro is an associate of the firm of Cole, Schotz, Meisel, Forman & Leonard, P.A.

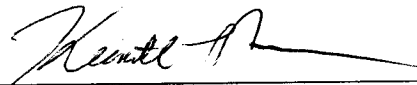
5. I have found Mr. Massaro to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Christopher P. Massaro, Esq. pro hac vice.

7. I respectfully submit a proposed order granting the admission of Christopher P. Massaro, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Christopher P. Massaro, Esq., pro hac vice, to represent Plaintiff in the above-captioned matter be granted.

Respectfully submitted



Kenneth L. Baum

Dated: February 6, 2008
New York, New York


Notary Public

KAREN L. CHIANDUSSE
A Notary Public of New Jersey
My Commission Expires 7/12/2012

Supreme Court of New Jersey

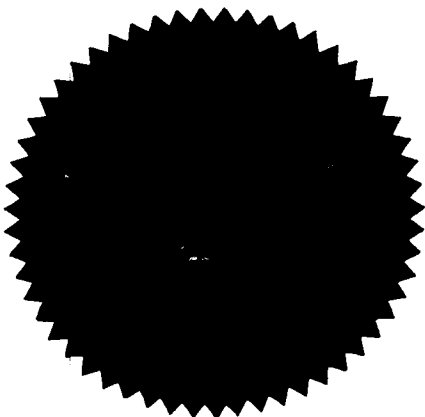


Certificate of Good Standing

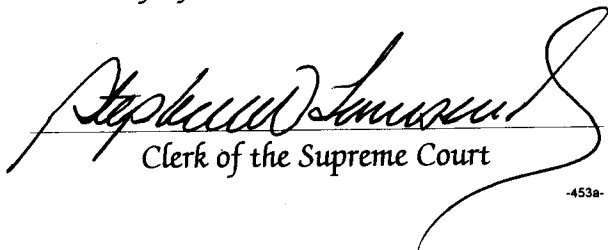
This is to certify that **CHRISTOPHER P MASSARO**
(No. **034252003**) was constituted and appointed an Attorney at Law of New
Jersey on **November 21, 2003** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
31ST day of January , 20 08


Clerk of the Supreme Court

Certificate of Good Standing



United States of America

-

District of New Jersey

I, *WILLIAM T. WALSH*, Clerk of the United States District Court for the District of New Jersey, do hereby certify that:

Christopher P. Massaro

was duly admitted to practice in said Court as of February 2, 2004, and is in good standing as a member of the Bar of said Court.

*Dated at Newark, New Jersey
on: February 1, 2008*

By

WILLIAM T. WALSH, CLERK

Carey P. Carlisle, Deputy Clerk

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EDUCATIONAL CREDIT
MANAGEMENT CORP.,

Plaintiff,

-against-

NU-VALET CLEANERS, INC.

Defendant.

CIVIL ACTION NO. 07-9531 (LTS)

Civil Action

**ORDER ADMITTING CHRISTOPHER
P. MASSARO, ESQ. *PRO HAC VICE* AS
COUNSEL FOR PLAINTIFF ON
WRITTEN MOTION**

UPON THE MOTION of Kenneth L. Baum, Esq., Cole, Schotz, Meisel, Forman & Leonard, P.A., attorneys for Plaintiff, Educational Credit Management Corp. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that,

Christopher P. Massaro, Esq.

Cole, Schotz, Meisel, Forman & Leonard P.A.

900 Third Avenue – 16th Floor

New York, New York 10022

and

25 Main Street, Hackensack, New Jersey 07601

(212) 752 8000 and (201) 525-6272

(201) 678-6272

cmassaro@coleschotz.com

is admitted to practice *pro hac vice* for Plaintiff, Educational Credit Management Corporation, in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to

the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ESC) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: February __, 2007
New York, New York

Hon. Laura Taylor Swain, U.S.D.J.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EDUCATIONAL CREDIT
MANAGEMENT CORP.,

Plaintiff,

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NU-VALET CLEANERS, INC.,

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: CIVIL ACTION NO. 07-9531 (LTS)
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: Civil Action
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: **AFFIDAVIT OF SERVICE**
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STATE OF NEW JERSEY)
)ss.:
COUNTY OF BERGEN)

KAREN L. CHIANDUSSE, being duly sworn, deposes and says:

1. I am a Paralegal employed with the Firm Cole, Schotz, Meisel, Forman & Leonard P.A., attorneys for Plaintiff Educational Credit Management Corporation, in the above-referenced matter. I am over eighteen (18) years of age and am not a party to the above-captioned action;

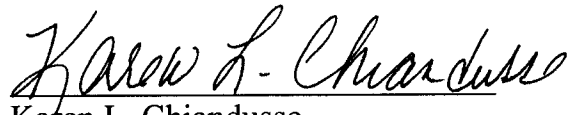
2. On the **5th** day of February, 2008 I served a copy of the following documents on behalf of Plaintiff:

(a) Notice of Motion to Admit Christopher P. Massaro, Esq. *pro hac vice* via regular mail delivery upon the following:

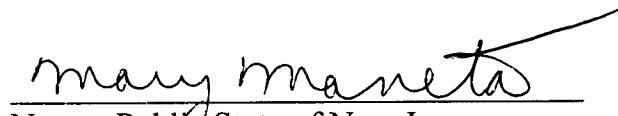
New York State Secretary of State
41 State Street
Albany, New York 12231

-and-

Nu-Valet Cleaners, Inc.
415 East 37th Street
New York, New York 10016


Karen L. Chiandusse

Sworn to before me this
5 day of FEBRUARY 2008


Notary Public State of New Jersey

MARY MANETAS
A Notary Public of New Jersey
My Commission Expires 4/18/2010